

Exhibit “A”

Criminal Complaint

CRIMINAL COURT OF THE CITY OF NEW YORK
PART APAR, COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK

v.

CHARLES SALDARRIAGA (37Y)

DEFENDANT

STATE OF NEW YORK
COUNTY OF QUEENS



DETECTIVE ERIC BOLGER OF DOCUMENT FRAUD, SQUAD, TAX REG #: [REDACTED] BEING DULY SWORN, DEPOSES AND SAYS THAT ON OR ABOUT MARCH 27 2024 BETWEEN 1:43PM AND 2:03PM, IN FRONT OF 28-19 STEINWAY STREET, COUNTY OF QUEENS, STATE OF NEW YORK, THE DEFENDANT COMMITTED THE OFFENSE OF:

PL 170.20 (AM) CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE THIRD DEGREE (3 COUNTS)

PL 170.20 (AM) CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE THIRD DEGREE (3 COUNTS)

--- WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, UTTER OR POSSESS A FORGED INSTRUMENT KNOWING IT WAS FORGED.

THE ABOVE OFFENSE WAS COMMITTED AS FOLLOWS:

DEPONENT STATES THAT HE IS INFORMED BY SERGEANT WILLIAM PLANETA OF THE DOCUMENT FRAUD SQUAD TAX REG [REDACTED] THAT AT THE ABOVE MENTIONED DATE, TIME, AND PLACE OF OCCURRENCE, HE OBSERVED THE DEFENDANT, CHARLES SALDARRIAGA, OPERATING A GREEN RANGE ROVER MOTOR VEHICLE BEARING FORGED REAR AND FRONT NEW YORK LICENSE PLATE NUMBER FOREV3R5.

DEPONENT STATES THAT THE DEFENDANT STATED IN SUM AND SUBSTANCE, I BOUGHT THE PLATES FROM THE DMV, I OWN THE VEHICLE.

DEPONENT STATES THAT HE EXAMINED THE ABOVE MENTIONED NEW YORK LICENSE PLATE NUMBER FOREV3R5 AND HIS CONCLUSION THAT SAID NEW YORK LICENSE PLATE IS FORGED IS BASED UPON HIS TRAINING IN THE DETECTION AND IDENTIFICATION OF FORGED INSTRUMENTS, AND THAT THE ABOVE MENTIONED FORGED NEW YORK LICENSE PLATE BACKGROUND IS BLACK IN COLOR, WHEREAS AN AUTHENTIC NEW YORK STATE LICENSE PLATE BACKGROUND WOULD NOT BE BLACK IN COLOR, AND THAT THE ABOVE MENTIONED FORGED NEW YORK LICENSE PLATE MOUNTING HOLES ARE CIRCULAR, WHEREAS AN AUTHENTIC NEW YORK LICENSE PLATE WOULD HAVE OBLONG MOUNTING HOLES, AND THAT THE LETTERING ON THE ABOVE MENTIONED FORGED NEW YORK LICENSE PLATE NUMBER IS RAISED, WHEREAS THE LETTERING ON AN AUTHENTIC NEW YORK STATE LICENSE PLATE WOULD BE FLAT.

AFF1108R3901059375

SALDARRIAGA, CHARLES [REDACTED]

DEPONENT FURTHER STATED THAT HE RECOVERED A POLICE BRONX DISTRICT ATTORNEY PARKING PLAQUE NUMBER [REDACTED] FROM THE ABOVE MENTIONED MOTOR VEHICLE'S GLOVE COMPARTMENT.

DEPONENT STATES THAT HE IS INFORMED BY DISTRICT ATTORNEY INVESTIGATOR JOHN RILEY THAT THE ABOVE MENTIONED POLICE BRONX DISTRICT ATTORNEY PARKING PLAQUE NUMBER [REDACTED] IS FORGED AND THAT HIS CONCLUSION THAT SAID PARKING PLAQUE IS FORGED IS BASED UPON HIS OBSERVATIONS THAT SAID POLICE BRONX DISTRICT ATTORNEY PARKING PLAQUE NUMBER [REDACTED] IS NOT A VALID OR ISSUED PLAQUE NUMBER, AND THAT THE LAST TWO DIGITS OF THE YEAR A PARKING PLAQUE WAS ISSUED SHOULD BE IN FRONT OF THE PARKING PLAQUE NUMBER, AND THAT THE DEFENDANT, CHARLES SALDARRIAGA, IS NOT A CURRENT EMPLOYEE OF THE BRONX DISTRICT ATTORNEY'S OFFICE.

FALSE STATEMENTS MADE IN THIS DOCUMENT ARE PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT TO SECTION 210.45 OF THE PENAL LAW

3/28/2021 R. E. S. 134 4680
DATE SIGNATURE

SWORN TO BEFORE ME ON THE
DAY OF

DATE SIGNATURE